Documentation of School Health Services

Records Management

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Records Management

Managing student health records can be challenging. 702 KAR 1:160, Section 3 gives guidance on maintaining individual student health records. The student's cumulative health record may contain the student medical record, immunization record, religious/medical exemptions, dental records and related documents. These records ensure that the student has met state mandated health requirements to attend school, verify immunizations and health history. These documents may also be used as the basis to protect the health of the general school population. (L2372 Student Cumulative Record, KY Local Agency Records Retention Schedule)

Kentucky State Archives Records Commission, Local Agency Records Retention Schedule

What is not included in the student cumulative health record?

- Educational records
- Nurses' personal notes. "Under Family Educational Rights to Privacy Act (FERPA), the "personal notes' of the maker (teacher, supervisor, school counselor, or administrator) and used only as a personal memory aid. They cannot be revealed to any person other than a temporary substitute or other replacement and are not considered part of the school records. All information pertinent to appropriate care should be adequately documented in the student's record. [34 CFR Section 99.31]. Personal notes are kept separate from the Narrative Notes.

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Record Keeping Issues

School district policies determine how student health records will be maintained. "FERPA governs all student health records maintained by school employees or services"..[especially] services directed to supporting students' participation and progress in school. These services are generally considered health promotion, health maintenance, and "related" or "support" services that enable students, especially those with special healthcare needs, to attend school, maintain (or improve) their health status during the school day, progress toward independence in self-care in the school setting and achieve educational success." ¹

The school district must address how to balance access to records, to insure appropriate treatment in emergencies, as well as how to protect against inappropriate access. (Student health information should be securely stored either in a locked file cabinet or limited access to computer stored health file). School districts should particularly be concerned with any daily log maintained of all student visits to the health office. It has long been a tradition in school health offices to document student office visits, their complaints and any assessment or intervention provided on one daily chronological record ("log"). Although this type of documentation is a simple way of recording daily health office activity, it also presents two very significant problems:

- 1. Under FERPA, parents may have access to their children's educational records (including health records.) If their child's health room visits are "logged" with other student's visits, this would violate the student's privacy as the other student's names, reason for health room visit and possible interventions would also be seen when recorded on a single health room log. Health room visit logs should only contain the time of arrival and dismissal, student name and whether the student returned to the classroom or sent home. All other information related to the student's health room visit should be documented in the student's individual health folder file or electronic health file. ²
- Scattered individual documentation of student health record is difficult to access whenever
 individual health information or documentation of a health room visit is needed. For example,
 when student transferring and health documentation needs to be shared with the new school.

NASN Privacy Standards for Student Health Records

NASN School Health Record Maintenance Issue Brief

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Electronic Documentation

Infinite Campus Health Documentation for Health Services: Student health electronic records may be utilized in lieu of the individual student cumulative health record (702 KAR 1:160). For more information, see Infinite Campus Health Office Instructional Program section.

References

- 1. Kelly, G., Federal Laws Protecting Children and Youth with Disabilities. In Selekeman, J (Ed.) (2006) *School Nursing: A Comprehensive Text* (p. 206). Philadelphia, PA: F. A. Davis
- 2. Schwab, N., Rubin, M., Maire. J., Gelfman, M., Bergren, M., Mazyck, D., & Hine, B. (2005) *Protecting and Disclosing Student Health Information*.(p.16) Kent, Ohio: American School Health Association

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